

Statement of Basis of the Federal Operating Permit

Union Carbide Corporation

Site Name: UCC Seadrift Operations
Area Name: Ethylene Oxide / Glycol
Physical Location: 7501 State Hwy 185 N
Nearest City: Seadrift
County: Calhoun

Permit Number: O2030
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869
SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: March 10, 2017

Operating Permit Basis of Determination

Permit Area Process Description

The Ethylene Oxide/ Glycol (EOGL) Plant consists of ethylene oxide operations, glycol reaction and refining operations, a gas turbine air supply system, and loading and unloading facilities with surge tanks. The EOGL Plant is classified as a chemical manufacturing process unit (CMPU) subject to the requirements of the Hazardous Organic NESHAPs (HON: MACTs F, G, H). Some of the storage and loading operations associated with the EOGL Plant are considered part of Distribution Systems which are addressed in a separate Title V application area.

Fugitive emissions within the EOGL Plant include VOC and HAPs. All fugitive sources throughout the EOGL Plant are potentially subject to MACT H (depending on service type). For the purposes of NSPS VV, the EOGL Plant may be considered two separate process units: the ethylene oxide process and the glycols process.

Various wastewater streams originate from the EOGL Plant and they are routed to several different Individual Drain Systems (IDS's) for wastewater. These wastewater streams may include VOC and HAPs, and the receiving IDS's are subject to MACT G requirements for wastewater streams. The MACT G wastewater requirements are all site-wide requirements, so the IDS's are not addressed as Title V emission units within this application area.

Ethylene Oxide

Ethylene, fed by pipeline, process air from the gas turbine, oxygen, water, and small amounts of organic reaction modifiers are reacted in the Fresh Reaction System to produce ethylene oxide (EO) as well as feed stream components. This mixture is transferred to the Fresh Scrubbing System. This system recovers crude EO from the fresh reaction stream, recycles gas back to the fresh reaction stream, and generates a blow-off stream of unreacted raw materials. A wastewater stream from the Fresh Scrubbing System is routed to the wastewater treatment system. Crude EO from the scrubbers is routed to Oxide Recovery/ Refining System (ORRS). The ORRS receives streams containing ethylene oxide from the Fresh Scrubbing System and the Blow-Off Reaction/ Scrubbers. Stripping and distillation operations within this system work collectively to produce product-quality ethylene oxide. Ethylene oxide product is transferred to the following destinations:

- Glycol Operations,
- Surge vessels and loading/ unloading facilities; and
- Downstream User Unit (addressed in separate Title V applications).

The ORRS produces a HAP/ VOC process vent stream from the Stripper Calandria (#1042) which is routed to atmosphere. Steam condensate from the ORRS is routed to the condensate tank (#101), which is vented to the atmosphere and may include VOC and HAPs.

Glycol Reaction and Refining Operations

These include systems for producing, concentrating, and refining ethylene and diethylene glycol (EG and DEG). A portion of the EO from the ORRS is fed to the Glycol Reactors, which when reacted with water produce a crude glycol mixture. This mixture is transferred to the Evaporator System. The Evaporator System removes water from the crude glycol stream in a series of evaporative steps and the glycol is progressively concentrated at each step.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1613, O2026, O2027, O2028, O2029, O2031, O2032, O2035

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, PM, NOX, HAPS, CO
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Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide

requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No

Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- Office activities such as photocopying, blueprint copying, and photographic processes.
- Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- Outdoor barbecue pits, campfires, and fireplaces.
- Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- Storage and handling of sealed portable containers, cylinders, or sealed drums.
- Vehicle exhaust from maintenance or repair shops.
- Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- Well cellars.
- Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.

18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
C-411	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p> <p>Control Device Type = Flare</p>
C-411	40 CFR Part 63, Subpart G	63G	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Flare</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p>
C-412	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p> <p>Control Device Type = Flare</p>
C-412	40 CFR Part 63, Subpart G	63G	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Flare</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
C-413	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Construction Date = On or after May 12, 1973</p> <p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Flare</p>
C-413	40 CFR Part 60, Subpart Kb	60Kb	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
GRPGLYCLTK	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p>
GRPGLYCLTK	40 CFR Part 63, Subpart G	63G	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
SDMG301	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
SDMG301	40 CFR Part 60, Subpart K	60K	<p>Construction/Modification Date = On or before June 11, 1973</p>
SDMG513	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>
SDMG513	40 CFR Part 60, Subpart K	60K	<p>Construction/Modification Date = On or before June 11, 1973</p>
SDT10	30 TAC Chapter 115, Storage of	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
	VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT10	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT12	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT12	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT13	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT13	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT15	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT15	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT16	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate

Unit ID	Regulation	Index Number	Basis of Determination*
SDT16	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT17	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT17	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT18	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT18	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT34	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT34	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
SDT9	30 TAC Chapter 115, Storage of VOCs	R5112	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate
SDT9	40 CFR Part 63, Subpart G	63G	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.

Unit ID	Regulation	Index Number	Basis of Determination*
OXRACK3	30 TAC Chapter 115, Loading and Unloading of VOC	R5-EO	<p>Chapter 115 Control Device Type = Vapor control system with a flare.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p>
OXRACK3	40 CFR Part 63, Subpart G	63G-EO	<p>Alternate Parameter Monitoring = Approval has not been sought or has not been granted by the EPA Administrator to monitor a parameter other than those specified in 40 CFR § 63.127(a) - (b).</p> <p>Control Device = Flare.</p> <p>Halogenated Emissions = There are no halogenated emission streams from the transfer rack.</p> <p>Transfer Rack Type = Group 1 transfer rack (as defined in 40 CFR § 63.111).</p> <p>Vapor Balancing System = A vapor balancing system is not being used to reduce emissions of organic hazardous air pollutants.</p> <p>Emissions Routing = Emissions of organic hazardous air pollutants are not routed to a fuel gas system nor to a process where the organic hazardous air pollutants meet one or more of the ends specified in 40 CFR § 63.126(b)(4)(i) - (iv).</p> <p>Bypass Lines = The vent system contains by-pass lines that could divert a vent stream flow away from the control device.</p> <p>Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H.</p> <p>Flow Indicator = The by-pass line valve is secured with a carseal or lock-and-key configuration.</p>
TETLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5-EO	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
1176	40 CFR Part 63, Subpart DDDDD	63DDDDD	Construction/Reconstruction Date = Construction or reconstruction began after June 4, 2010.
1013	30 TAC Chapter 111, Visible Emissions	R1111	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>
1013	40 CFR Part 60, Subpart A	60A	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
1013	40 CFR Part 63, Subpart A	63A	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			Flare Assist Type = Air assisted
1013	40 CFR Part 63, Subpart A	63A-1	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63. Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
1014	30 TAC Chapter 111, Visible Emissions	R1111	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
1014	40 CFR Part 60, Subpart A	60A	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
1014	40 CFR Part 63, Subpart A	63A	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63. Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
SD108	30 TAC Chapter 111, Visible Emissions	R1111	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
SD108	40 CFR Part 60, Subpart A	60A	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
SD108	40 CFR Part 63, Subpart A	63A	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.
SD108A	30 TAC Chapter 111, Visible Emissions	R1111	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
SD108A	40 CFR Part 60, Subpart A	60A	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
SD108A	40 CFR Part 63, Subpart A	63A	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63. Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
97A	40 CFR Part 60, Subpart GG	60GG	Peak Load Heat Input = Heat Input is greater than 100 MMBtu/hr (107.2 GJ/hr) Construction/Modification Date = On or before October 3, 1977.

Unit ID	Regulation	Index Number	Basis of Determination*
97A	40 CFR Part 63, Subpart YYYY	63YYYY	Construction/Reconstruction Date = Turbine was constructed, modified or reconstructed on or before 1/14/2003.
OX2-FUG	40 CFR Part 60, Subpart VV	60VV	<p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Construction/Modification Date = On or before January 5, 1981.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p>
OX2-FUG	40 CFR Part 63, Subpart H	63H	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p>
OX2-GLFUG	40 CFR Part 60, Subpart VV	60VV	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit does not contain compressors.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Equipment in VOC Service = The fugitive unit contains equipment designed to operate in VOC service.</p> <p>Flare = The fugitive unit does not contain flares.</p> <p>Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit contains pressure relief devices in heavy or light liquid service.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit contains pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit does not contain valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.</p> <p>VOC Service = Fugitive unit does not contain equipment designed to operate in VOC service less than 300 hours per year.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Complying with 40 CFR § 60.482-8 = Pumps in heavy liquid service are complying with § 60.482-8.</p> <p>Pumps in Light Liquid Service = The fugitive unit does not contain pumps in light liquid service.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.</p> <p>Valves in Heavy Liquid Service = The fugitive unit contains valves in heavy liquid service.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6.</p> <p>Complying with 40 CFR § 60.482-8 = Valves in heavy liquid service are complying with § 60.482-8.</p> <p>Equipment in VOC Service = The facility contains equipment designed to operate in VOC service.</p>
OX2-GLFUG	40 CFR Part 63, Subpart H	63H	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p>
100	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
100	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
101	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.
101	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
1042	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
1042	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60,</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Subparts III, NNN or RRR.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
118	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
118	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
97A	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
97A	30 TAC Chapter	R5121	Alternate Control Requirement = Alternate control is not used.

Unit ID	Regulation	Index Number	Basis of Determination*
	115, Vent Gas Controls		<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
97A	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
99	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
99	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
RB-101	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
RB-109	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>
RB-110	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
RB-111	40 CFR Part 63, Subpart G	63G	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>NSPS TRE Index Value = TRE index value is greater than 8 as calculated using the appropriate equation from 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>MACT TRE Index Value = TRE index value is greater than 4.0 as calculated using the procedures of 40 CFR § 63.115(d).</p>
SD108VNT	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p>
100	40 CFR Part 60, Subpart NNN	60NNN	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Total Resource Effectiveness = TRE index value greater than 8.0 not from a halogenated vent stream.</p> <p>Construction/Modification Date = After December 30, 1983.</p> <p>Subpart NNN Control Device = EPA Administrator approved demonstration of compliance with 40 CFR § 60.662 other than 40 CFR § 60.663(a), (b), (c), or (d).</p> <p>Vent Type = Distillation unit not discharging vent stream into a vapor recovery system.</p> <p>Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3).</p> <p>Total Design Capacity = 1 gigagram per year or greater.</p> <p>Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min.</p>
1042	40 CFR Part 60, Subpart NNN	60NNN	<p>Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.</p> <p>Total Resource Effectiveness = TRE index value greater than 8.0 not from a halogenated vent stream.</p> <p>Construction/Modification Date = After December 30, 1983.</p> <p>Subpart NNN Control Device = EPA Administrator approved demonstration of compliance with 40 CFR § 60.662 other than 40 CFR § 60.663(a), (b), (c), or (d).</p> <p>Vent Type = Distillation unit not discharging vent stream into a vapor recovery system.</p> <p>Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3).</p> <p>Total Design Capacity = 1 gigagram per year or greater.</p> <p>Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min.</p>
118	40 CFR Part 60, Subpart NNN	60NNN	<p>Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.</p> <p>Total Resource Effectiveness = TRE index value greater than 8.0 not from a halogenated vent stream.</p> <p>Construction/Modification Date = After December 30, 1983.</p> <p>Subpart NNN Control Device = EPA Administrator approved demonstration of compliance with 40 CFR § 60.662 other than 40 CFR § 60.663(a), (b), (c), or (d).</p> <p>Vent Type = Distillation unit not discharging vent stream into a vapor recovery system.</p> <p>Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3).</p> <p>Total Design Capacity = 1 gigagram per year or greater.</p> <p>Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min.</p>
99	40 CFR Part 60, Subpart NNN	60NNN	<p>Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.</p> <p>Total Resource Effectiveness = TRE index value greater than 8.0 not from a halogenated vent stream.</p> <p>Construction/Modification Date = After December 30, 1983.</p> <p>Subpart NNN Control Device = EPA Administrator approved demonstration of compliance with 40 CFR § 60.662 other than 40 CFR § 60.663(a), (b), (c), or (d).</p> <p>Vent Type = Distillation unit not discharging vent stream into a vapor recovery system.</p> <p>Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3).</p> <p>Total Design Capacity = 1 gigagram per year or greater.</p> <p>Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
PROEOGL	40 CFR Part 63, Subpart F	63F-1	<p>Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).</p> <p>Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.</p> <p>Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.</p> <p>Table 4 HAP Content = The recirculating heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.</p> <p>Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.</p> <p>NPDES Permit = The once-through heat exchange system is not subject to NPDES permit with an allowable discharge limit of 1 part per million or less above influent concentration or 10 percent or less above influent concentration.</p> <p>Meets 40 CFR 63.104(a)(4)(i)-(iv) = The once-through heat exchange system is not subject to an NPDES permit that meets 40 CFR § 63.104(a)(4)(i) - (iv).</p> <p>Heat Exchange System = A heat exchange system is utilized.</p> <p>Table 9 HAP Content = The once-through heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 9 of 40 CFR Part 63, Subpart G.</p> <p>Cooling Water Monitored = The cooling water is being monitored for the presence of one or more HAPs or other representative substances whose presence in cooling water indicates a leak.</p> <p>Cooling Water Pressure = The heat exchange system is not operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.</p>

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 22321	Issuance Date: 01/28/2015
Authorization No.: 48653	Issuance Date: 02/19/2013
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance

monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: C-411	
Control Device ID No.: 1013 OR 1014	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Absence of Pilot Flame	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: C-412	
Control Device ID No.: 1013 OR 1014	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Absence of Pilot Flame	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: C-413	
Control Device ID No.: 1013 OR 1014	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Absence of Pilot Flame	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Compliance Review

- In accordance with 30 TAC Chapter 60, the compliance history was reviewed on **February 14, 2017**.
 Site rating: **0.00 / High** Company rating: **0.56 / Satisfactory**
(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
- Has the permit changed on the basis of the compliance history or site/company rating?No

Site/Permit Area Compliance Status Review

- Were there any out-of-compliance units listed on Form OP-ACPS?No
- Is a compliance plan and schedule included in the permit?No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
 OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
 OP-UA3 - Storage Tank/Vessel Attributes
 OP-UA4 - Loading/Unloading Operations Attributes
 OP-UA5 - Process Heater/Furnace Attributes
 OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
 OP-UA7 - Flare Attributes
 OP-UA8 - Coal Preparation Plant Attributes
 OP-UA9 - Nonmetallic Mineral Process Plant Attributes
 OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
 OP-UA11 - Stationary Turbine Attributes
 OP-UA12 - Fugitive Emission Unit Attributes
 OP-UA13 - Industrial Process Cooling Tower Attributes
 OP-UA14 - Water Separator Attributes
 OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
 OP-UA16 - Solvent Degreasing Machine Attributes
 OP-UA17 - Distillation Unit Attributes
 OP-UA18 - Surface Coating Operations Attributes
 OP-UA19 - Wastewater Unit Attributes

OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes